

1 ANDREW C. GREEN, ESQ.
2 Nevada Bar No. 9399
3 KOELLER NEBEKER CARLSON
4 & HALUCK, LLP
5 400 S. 4th Street, Suite 600
6 Las Vegas, NV 89101
Phone: (702) 853-5500
Fax: (702) 853-5599
5 Attorneys for Defendants,
AMERICAN STATES INSURANCE COMPANY and
6 SAFECO INSURANCE COMPANY OF INDIANA

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MARCIA FREUD, an Individual,) CASE NO.: 2:16-cv-02623-JAD-VCF
10 Plaintiff,)
11 vs.)
12 AMERICAN STATES INSURANCE)
13 COMPANY d/b/a SAFECO INSURANCE,)
14 an Indiana corporation; GUILLERMO)
15 URRUTIA, an individual; BEATRIS)
16 URRUTIA, an individual; DOES I through X,)
inclusive and ROE CORPORATIONS I)
through X, inclusive,)
16 Defendants.)
17

)
) **STIPULATION AND ORDER FOR**
) **EXTENSION OF TIME FOR**
) **PLAINTIFF TO FILE ITS REPLY IN**
) **SUPPORT OF MARCIA FREUD'S**
) **MOTION TO REMAND AND MOTION**
) **FOR ATTORNEY'S FEES**

) [ECF No. 22]

18 **COME NOW**, Plaintiff, MARCIA FREUD (hereinafter "Plaintiff"), by and through
19 her attorney, the law firm of BREEDEN & ASSOCIATES, PLLC, and Defendants,
20 AMERICAN STATES INSURANCE COMPANY (hereinafter "American States") and
21 SAFECO INSURANCE COMPANY OF INDIANA (hereinafter "Safeco") erroneously
22 named as AMERICAN STATES INSURANCE COMPANY d/b/a SAFECO, and hereby
23 agree to an extension of time for Plaintiff to file her Reply in support of her Motion to Remand
24 and Motion for Attorney's Fees (hereinafter "Motion") (Court Document #12). The
25 Stipulation is intended to be submitted in compliance with LR IA 6-1. The underlying Motion
26 was filed December 12, 2016, and Plaintiff's Reply in support of that Motion is understood to
27 originally be due on this date, January 3, 2017. This is the first request to extend the deadline
28 for Plaintiff to file a Reply in support of her Motion. Presently, no hearing has been scheduled

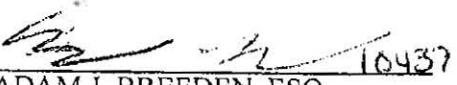
1 for Plaintiff's Motion. The parties stipulate to extend the time for Plaintiff to file her Reply in
2 support of her motion to remand until January 16, 2017.

3 To the extent necessary, the parties stipulate good cause appears to be presented to
4 permit the extension agreed-upon herein. In particular, the Stipulation is submitted on this date
5 upon learning of a medical emergency for counsel for Plaintiff requiring counsel for Plaintiff
6 to unexpectedly depart his office without ability to return until January 9, 2017, at the earliest.

7 Dated this 3rd day of January, 2017.

Dated this 3rd day of January, 2017.

8 BREEDEN & ASSOCIATES, PLLC

9 KOELLER NEBEKER, CARLSON &
10 By:  10437 By: 

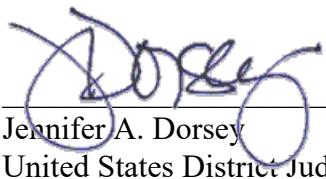
11 for ADAM J. BREEDEN, ESQ.
12 Nevada Bar No. 8768
13 1404 S. Jones Boulevard
14 Las Vegas, NV 89146
15 Attorney for Plaintiff,
16 MARCIA FREUD

17 ANDREW C. GREEN, ESQ.
18 Nevada Bar No. 9399
19 400 S. 4th Street, Suite 600
20 Las Vegas, NV 89101
21 Attorneys for Defendants,
22 AMERICAN STATES
23 INSURANCE COMPANY and
24 SAFECO INSURANCE
25 COMPANY OF INDIANA

26 **ORDER**

27 Good cause appearing, IT IS HEREBY ORDERED that the time for
28 plaintiff to file any reply in support of her motion to remand and for attorney's fees
[ECF No. 12] is **EXTENDED** to January 16, 2017.

19 DATED this 3rd day of January, 2017.

20 
21 _____
22 Jennifer A. Dorsey
23 United States District Judge
24
25
26
27
28